



**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matters of

Facilitating the Deployment of Text-to-911 and     )  
Other Next Generation 911 Applications             )

PS Docket No. 11-153

Framework for Next Generation 911 Deployment    )

PS Docket No. 10-255

**Comments Sought on 911 Notice of Proposed Rule Making**  
**FCC 11-134**

GreatCall, Inc. hereby submits these brief comments to the Federal Communications Commission's (Commission) above referenced *Notice of Proposed rulemaking* released September 22, 2011.

**I. BACKGROUND**

GreatCall, Inc.<sup>1</sup>, based in San Diego, California, is the leader in delivering easy-to-use, affordable and life-enhancing services to people who seek simplicity. GreatCall files these comments on behalf of its mobile phone service that offers easy-to-use features for those seeking

---

<sup>1</sup> GreatCall, Inc., creator of the Jitterbug cell phone, is a leader in wireless services that enable people to stay connected, safe and healthy. GreatCall's mobile phones and services are sold nationwide through leading retailers including Sears, Best Buy and Radio Shack as well as direct to consumers. GreatCall's Responder is a first-of-its-kind wireless device that allows its users to access GreatCall's 5Star Urgent Response service at a touch of a button, at home or on the go. Service coverage includes the U.S. and Canada. GreatCall is located in San Diego, CA. [www.greatcall.com](http://www.greatcall.com).

simplicity and those who have hearing, visual, mobility or cognitive disabilities. GreatCall also offers services that are designed to improve the safety of its customers by using their mobile phone and customer service platform. The 5Star Urgent Response Service enables GreatCall customers to immediately connect to a certified response agent, 24 hours a day, 365 days a year. The response agent arranges appropriate assistance, while providing real-time professional support to the caller. The agent will determine the type of emergency or urgent situation, dispatch the appropriate assistance, or connect to 911 or family members for familiar support, while remaining on the line to ensure resolution.

The unique position of GreatCall enables safety services to be improved through an integrated device, network, and call center experience. Traditional personal emergency response services are effective in and around the user's home and are expensive. Most smart phone applications consist of a panic button, direct dial to 911, or an SMS, email, or call message to personal contacts, which are not that effective in most situations. 5Star provides the freedom to live an active lifestyle and have help immediately available at a very affordable price.

## **II. ACCELERATING NG911 TECHNOLOGY**

The Commission seeks comments on short and long term proposals for NG911 deployment. GreatCall's comments focus on Sections IIIA and IIIB of the NPR, regarding benefits and approaches to facilitate Short-Term Deployment of Text-to-911.

*Balancing these considerations, we believe that PSAPs, providers, and vendors should have the option to implement SMS-to-911 as a short-term alternative. We seek comment on this view and on whether the benefits of leveraging SMS-to-911 on an interim basis outweigh the limitations of SMS.*

GreatCall agrees with the Commission's view that there are benefits to implementing a short-term SMS-to-911 alternative. GreatCall believes that the use cases identified are valid, that

the proposed short-term solution addresses these use cases, and that the benefits outweigh the costs. Specifically, GreatCall's position is that a short term SMS-to-911 implementation would provide valuable and needed services to constituents today, while the perfect solution would take years to reach 100% roll out from carriers, PSAPS, and device manufacturers, with additional years necessary for 100% consumer migration to the new platform.

*We also seek comment on the feasibility of overcoming or mitigating SMS technical limitations at a reasonable cost to providers, PSAPs, and consumers. Specifically, we seek comment on Kimball's proposal regarding selecting a different point of interconnection between the SMS system and 911.*

GreatCall agrees with Kimball that there are technically feasible methods of mitigating SMS technical limitations. However, the advantage of using SMS is its universal availability and immediate implementation benefits. In order to best leverage these advantages, a pure network solution is preferable. This approach would enable text-to-911 functionality on virtually all cell phones. Features that could be available on a pure network implementation are 1) Priority delivery; 2) PSAP acknowledgements; 3) Inactive handset support. The main feature that would not be available with this solution is location support.

*Intrado argues that any text-to-911 "solution should use the digits 9-1-1." We seek comment on whether a national short code for SMS-to-911 should be designated by the Commission, a standards-setting body, or some other entity. If so, how should this short code be designated and implemented.*

GreatCall is in agreement with Intrado's assessment. Short codes can be implemented on the network relatively easily and are commonly used for television program voting, mobile services, and charity donations. A short code which ties the digits "911" to a 911 call is implementable as a pure network solution. Therefore, if this solution were implemented on a national basis, all phones that support SMS would have immediate SMS-to-911 capability.

Designation of a national short code by the FCC is the most effective way of ensuring nationwide compliance in a short period of time.

*Further, one limitation that most commenters recognized is the inability of SMS to provide accurate location information for routing or PSAP dispatch purposes. To overcome this limitation, would it be technologically feasible for the recipient of an emergency SMS, such as the ALI database provider, to query for the location using the phone number provided, assuming that it can identify the originating provider?*

GreatCall's position is that getting location for the short term solution is a great idea, but should not be mandatory. Generally the level of accuracy of network-level location information is at the cell sector level, and may not be sufficiently accurate to be useful. In addition if such a system were implemented, location information should be sent via SMS, so as to not create additional complexity for the short term solution.

*We seek comment on the feasibility of using general texting or 911-specific applications to support a transitional non-voice NG911 system that would allow consumers to send text and other non-voice media to PSAPs. Such a system would consist of two components: (1) one or more databases that describe where text-to-911 capabilities are available and how to reach the appropriate PSAP; and (2) one or more software applications for smartphone operating systems.... The application would obtain location information, including cell tower identity, from smartphone operating systems and would rely on standard IP connectivity to deliver a message to the right destination based on a location database.*

Smartphones provide a communications platform through which third party applications can access useful information. Such third party applications can access location information via WIFI SSID, Assisted GPS, Stand alone GPS, or other method and attach that information on to an SMS message which can be sent via short code to a PSAP. GreatCall believes that there is much value in this solution. However, we believe GPS should not mandatory, and location information should be sent as an SMS message, so as to not create additional complexity for the short term solution.

### **III. CONCLUSION**

GreatCall is in agreement that a phased approach to NG911 is a good option. The short term proposal of text-to-911 offers a substantial benefit to the public in that it addresses an immediate market need for 911 accessibility. GreatCall appreciates the opportunity to submit comments in this important proceeding.

Respectfully submitted,



David Inns  
CEO  
GreatCall  
12680 High Bluff Drive, Suite 310  
San Diego, CA 92130